COMMONWEALTH OF VIRGINIA
Department of Environmental Quality
West Central Regional Office

STATEMENT OF LEGAL AND FACTUAL BASIS

January 17, 2006

Wolverine Gasket Div.
Eagle-Picher Automotive, Inc.
201 Industrial Park Road S.E.
Blacksburg, Virginia 24060
Permit No. VA-20763

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Eagle-Picher Industries has applied for a reopening of the Title V Operating Permit for its Blacksburg, VA facility to add language regarding new MACT requirements and incorporate language changed in the underlying NSR permit to reflect modifications related to MACT compliance. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

FACILITY INFORMATION

Permittee
Wolverine Gasket Division
Eagle-Picher Automotive, Inc.
201 Industrial Park Road S.E.
Blacksburg, VA 24060

Facility
Blacksburg Plant
Wolverine Gasket Div.
Eagle-Picher Automotive, Inc.
201 Industrial Park Road S.E.
Blacksburg, VA 24060

County-Plant ID No. 51-121-0065

SOURCE DESCRIPTION

This plant manufactures gasket material, primarily for the automotive industry, by coating aluminum or steel metal coils with organic coatings. The organic coatings are similar to solvent-based paints. The coatings are applied to the metal coils as a liquid without spraying, and immediately dried and cured in a heated curing oven. The application stations and heated curing ovens of coating line 2 and 4 are totally enclosed with VOC emissions exhausting to one (1) regenerative thermal oxidizer (RTO) to destroy VOC emissions. Both coating line 2 and coating line 4 are required to have a 98% control efficiency in order to meet the existing source requirements of MACT SSSS. VOCs, including VOC HAPS, are the primary pollutants emitted from this facility with a vast majority coming from the coating operation.

Sideline operations that are not insignificant consist of a coating mixing/coating preparation area (M1) having only a small amount of VOC emissions. Insignificant sideline operations include one small Waldron line used to apply water based coatings and its very small gas fired dryer, two Diablo in-line process heaters, gasket stamping operations without emissions, small solvent storage tanks, and other miscellaneous insignificant natural gas burning units

The initial plant consisted of only coating line #2 with its thermal incinerator. The initial plant was designed in 1972 and constructed in 1973, before the state issued air emission permits, but after the new source regulations applied. The plant was a registered source from the beginning. The larger coating line #4 commenced construction on March 30, 1989 in accordance with the state permit to construct and operate issued January 24, 1989 and revised April 21, 1989. Most recently the plant replaced the aging thermal incinerators with a single RTO to control emissions from both lines.

40 CFR 60 Subpart TT (NSPS TT), Metal Coil Coating, applies to coating line #4 but does not apply to coating line #2, because this NSPS applies only to coating lines constructed or modified after January 5, 1981. 40 CFR 63 Subpart SSSS (NESHAP SSSS) (MACT SSSS), Surface Coating of Metal Coils, applies to both coating line #2 and #4, as existing sources. The NESHAP requirements, which are equally or more stringent than all NSPS requirements, will regulate the coil coating application stations/flash-off areas, drying/curing ovens, and the RTO controlling emissions. That is, for this permit's administrative efficiency, NSPS TT requirements will be streamlined out/ subsumed by the NESHAP SSSS requirements on its effective date of June 10, 2005. However, NESHAP SSSS does not apply to the coating mixing/preparation equipment (M1), storage tanks, or other miscellaneous fuel burning activities.

The compliance date of NESHAP 40 CFR 63 Subpart SSSS, Surface Coating of Metal Coils, for existing facilities including coating lines #2 and #4 was June 10, 2005. The monitoring and recordkeeping portions of NESHAP 40 CFR 63 Subpart SSSS satisfy CAM.

PSD did not apply to the 1989 permit for adding 104.1 tons/yr VOC emission from adding coating line #4 with 95% efficient incineration because the same permit added VOC emissions limits and control efficiency limitations to coating line #2 for 101.1 tons/yr VOC emissions and 90% efficient incineration, in keeping with its actual practice. Therefore, the existing source was formally limited to less than the 250 tons/yr major source threshold with regards to PSD. The plant is currently still a minor PSD source (i.e., emissions are less than 250 tons/yr for each individual criteria pollutant), but the plant is a Title V major source due to potential controlled emissions exceeding 100 tons/yr of VOC, 10 tons/yr of a single HAP, and 25 tons/yr combined HAPs. The HAPs are non-halogenated VOC solvents such as toluene and methyl ethyl ketone in the organic solvent-based organic coating, and all the VOC solvents are assumed to evaporate.

This permit is being reopened due to equipment changes and inclusion of requirements necessary for compliance with 40 CFR 63 Subpart SSSS, Surface Coating of Metal Coils. All permit changes are the result of compliance with additional federal standards. One VOC emission control device has replaced several less efficient control devices. Emission limits have not increased but rather have substantially decreased. Therefore this reopening is being treated as a minor permit modification rather than a significant modification. USEPA review will be solicited but no public comment will attach to this reopening.

COMPLIANCE STATUS

The plant has a history of being in compliance with DEQ's State Air Pollution Control Board Regulations. At least 20 inspections found the plant to be in compliance with DEQs Regulations for the Control and Abatement of Air Pollution with little history of non-compliance. These inspections were conducted approximately once per year. Both coating lines have passed stack testing for VOC control efficiency as detailed below in the testing sections for the coating lines.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emission units are grouped as follows:

Coating Lines: requirements for Coating Lines #2 and # 4.

Miscellaneous Equipment: requirements for mixing operations.

Facility Wide: requirements for both coating and mixing operations.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

Equipment to be operated consists of:

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description
CL2	RTO1	Coating Line #2	324 lbs/hr VOC	regenerative thermal oxidizer
CL4	RTO1	Coating Line #4 – composed of CL4-1 and CL4-2	1,080 lbs/hr VOC	regenerative thermal oxidizer
CL4-1	RTO1	Coating Line #4-1 for rubber and primer	Part of 1,080 lbs/hr VOC	regenerative thermal oxidizer
CL4-2	RTO1	Coating Line #4-2 for adhesive and water based graphite	Part of 1,080 lbs/hr VOC	regenerative thermal oxidizer
M1	V01	Coating Line Mixing Room (mixing/coating preparation equipment)	NA	NA

*The Size/Rated capacity is provided for informational purposes only, and is not an applicable requirement.

Pollutant control devices of the equipment to be operated:

Emission Unit ID	Stack ID	Emission Unit Description	PCD ID	Pollutant Controlled	Applicable Permit Date
CL2	RTO1	Coating Line #2	RTO	VOC and VOC HAPs	October 6, 2005
CL4	RTO1	Coating Line #4 – composed of CL4-1 and CL4-2	RTO	VOC and VOC HAPs	October 6, 2005
CL4-1	RTO1	Coating Line #4-1 for rubber and primer	RTO	VOC and VOC HAPs	October 6, 2005
CL4-2	RTO1	Coating Line #4-2 for adhesive and water based graphite	RTO	VOC and VOC HAPs	October 6, 2005

EMISSIONS INVENTORY
Emissions are summarized in the following tables.

2003 Actual Emissions

2003 Criteria Pollutant Emission in Tons/Year				
VOC	CO	SO_2	PM_{10}	NO_x
9.3	4.56	0.03	0.11	5.43

2003 Facility Hazardous Air Pollutant Emissions

Pollutant	2003 Hazardous Air Pollutant Emission in Tons/Yr
Methyl Ethyl Ketone	1.54
Toluene	6.51

EMISSION UNIT APPLICABLE REQUIREMENTS

New Source Review Permit Requirements

The majority of conditions contained in the federal operating permit are requirements necessary to comply with the conditions of the New Source Review permit for the facility issued October 6, 2005. A Copy of the permit is attached as Appendix B. The conditions of the federal operating permit and the corresponding conditions of the NSR permit are displayed in the table below:

Title V Condition	NSR Condition	Description	VAC Applicable Requirement
III-A-1	3	Enclosure of coating lines	9 VAC 5-50-260, 9 VAC 5-60-100
III-A-2	4	VOC control for coating lines	9 VAC 5-50-260, 9 VAC 5-60-100
III-A-3	5	Control efficiency of RTO	9 VAC 5-50-260, 9 VAC 5-60-100
III-A-4	7	Throughput limit for Coating Line #2	9 VAC 5-80-1180
III-A-5	8	Throughput limit for Coating Line #4	9 VAC 5-80-1180
III-A-6	9	Emission limit for Coating Line #2	9 VAC 5-50-260
III-A-7	10	Emission limit for Coating Line #4	9 VAC 5-50-260
III-A-8	11	Visible emission limit for coating lines	9 VAC 5-50-260
III-A-9	12	Requirement by reference – NSPS TT	9 VAC 5-50-400, 9 VAC 5-50-410
III-A-10	13	Requirement by reference – MACT SSSS	9 VAC 5-60-90, 9 VAC 5-60-100
III-A-11	14	Resolution of NSPS/MACT discrepancies	9 VAC 5-60-90, 9 VAC 5-60-100
III-A-12	15	Shutdown for excess HAP emissions	9 VAC 5-20-180
III-B-1	4	Monitoring requirements for RTO	9 VAC 5-50-260, 9 VAC 5-60-100
III-C-1	19a	Coating line throughput records	9 VAC 5-50-50
III-C-2	19e	VOC emissions from coating lines	9 VAC 5-50-50
III-C-3	19c	Continuous temperature records for RTO	9 VAC 5-50-50
III-C-7	19b	Records of stack test and VEE results	9 VAC 5-50-50
III-C-8	19d	Retained Material Safety Data Sheets	9 VAC 5-50-50
III-C-9	19f	Records of maintenance & training	9 VAC 5-50-50
III-D-1	6	Appropriately placed test ports	9 VAC 5-50-30
III-D-2	16	Testing for total permanent enclosure	9 VAC 5-60-100
III-D-3	17	Performance test for RTO	9 VAC 5-60-90, 9 VAC 5-60-100

Title V Condition	NSR Condition	Description	VAC Applicable Requirement
III-D-5	18	VEE's on request	9 VAC 5-50-30
V-A-1	23	Required maintenance and training procedures	9 VAC 5-50-20
V-A-2	22	Violation of ambient air quality standard	9 VAC 5-20-180

MACT Requirements

The facility is subject to the Surface Coating of Metal Coils MACT (40 CFR 63 Subpart SSSS). A requirement by reference is included in the Process Equipment section of the operating permit (III-A-10). Additional permit requirements have been included in the federal operating permit based upon the choices made by the facility to demonstrate compliance with Subpart SSSS. The following requirements relate to compliance with the MACT:

Monitoring Requirements: III-B-2, III-B-3, III-B-5
Recordkeeping Requirements: III-C-2*, III-C-3*, III-C-4, III-C-5, III-C-6
Testing Requirements: III-D-2*, III-D-3*, III-D-4
Reporting Requirements: III-E-1, III-E-2

* indicates a requirement from the NSR permit is modified or expanded to comply with SSSS

Visible Emission Limit Requirements

Visible emission limits are required under 9 VAC 5-40-80 and 9 VAC 5-50-80. Additionally visible emissions are used as monitoring for compliance with requirements for BACT under 9 VAC 5-50-260. Weekly visible emission evaluations were added to satisfy periodic monitoring guidance for federal operating permits, specifically Conditions III-B-6 and III-C-10. No specific NSR conditions apply to the mixing room as no modification as technically defined has occurred. However, throughput increases have occurred as a result of modifications to the coating lines. As such, VDEQ has applied a BACT standard to visible emissions from this area (Conditions IV-A-1, IV-B-1 and IV-D-1) without objection from the source.

Standard Testing Methods

It is the practice of the agency to reference the appropriate USEPA test methods for testing done in addition to monitoring explicitly specified in federal operating permits. Conditions III-D-6 and IV-D-1 summarize the appropriate test methods.

Miscellaneous Requirement

Monitoring requirements for the permanent total enclosures in excess of the NSR requirements were added for compliance with MACT SSSS. Installation, maintenance and calibration standards for this increased monitoring were added to the federal operating permit to make the monitoring provisions consistent with the CAM plan proposed by the source. Condition III-B-4 addresses these additional standards.

COMPLIANCE ASSURANCE MONITORING

Following the October 6, 2005 NSR permit, Wolverine is no longer a major source for criteria pollutants. Only the emission unit subject to Subpart TT, Coating Line # 4, requires a CAM plan. As both coating lines are also subject to Subpart SSSS, it is presumed that a CAM plan description of the compliance procedures for Subpart SSSS is adequate in satisfying the CAM requirement. For clarity, Wolverine has elected to include Coating Line # 2 in the plan.

CAM Plan for Coating Lines #2 and #4 (CL2 and CL4)

Since CL2 and CL4 are subject to NESHAP Subpart SSSS monitoring, and the monitoring required by this NESHAP is assumed to be adequate for CAM according to 64.2(b)(1)(i) and 64.4(b)(4); Wolverine is proposing a CAM Plan for CL2 and CL4 that is the monitoring and recordkeeping portions of NESHAP 40 CFR 63 Subpart SSSS to satisfy CAM. Because the effectiveness of oxidizing VOC is highly dependent upon the temperature that the incoming gas stream is exposed to, it is necessary to continuously monitor the temperature of the combustion chamber of the thermal incinerators(s) operated at the Blacksburg plant. Wolverine has a thermocouple installed at or near the combustion chamber of each of the three thermal incinerator(s) that continuously monitor the combustion chamber temperature. The thermocouples used meet the accuracy requirements of MACT SSSS.

Indicator Range-Temperature Established During Testing

Wolverine established a 3-hour average low temperature reading of 1589 ^{o}F during compliance testing for Subpart SSSS. As NSPS TT and MACT SSSS have different standards for temperature monitoring, the more stringent accuracy requirement from MACT SSSS is deemed to be the prevailing standard.

Indicator Monitoring Frequency - Temperature

Wolverine currently records the temperature from the thermocouples located at various positions the combustion chamber of the RTO continuously on a strip chart recorder. This is more stringent than the requirements of 64.3(b)(4)(ii), which requires large PSEUs to collect four or more data values equally spaced over each hour for compliance with the applicable emission limit. If Wolverine chooses to digitally record the thermocouple readings in the future, Wolverine will ensure that 3-hour block averages are calculated and maintained above the combustion chamber temperature limit.

Specific QAQC Practices - Temperature Monitors

Wolverine proposes to calibrate and maintain the thermocouples in accordance with the NESHAP Subpart SSSS requirements detailed in § 63.1250(a)(3)(ii). Specifically, Wolverine will calibrate the temperature monitor and chart recorder every three months. If the equipment cannot be calibrated or Wolverine chooses not to perform the calibration, the equipment will be replaced every 3 months.

Recordkeeping Practices - Temperature Monitors and Corrective Actions

Wolverine will maintain the output from the strip chart recorder or alternative data acquisition system records acceptable to VDEQ, records of any corrective actions taken to correct the RTO temperature if it falls outside the proposed range, and a record of each calibration performed for a period of at least five years.

CAM Plan for Capture System Monitoring

Indicator Monitored – Enclosure Pressure Drop with Windows and Doors Closed

Wolverine will monitor the pressure drop across the total enclosure associated with CL2 and CL4 (one station for CL2 and three stations for CL4), when the operator access windows and doors are closed. Operators are trained to keep the access windows and doors closed at all times when coatings are being applied, unless an adjustment is needed for safety or quality reasons. Wolverine will also monitor the pressure drop across the primer room enclosure. Maintaining a pressure drop across the enclosure will ensure that any VOC released at the point of application will be collected and routed to one of three thermal incinerators for control rather than escaping directly to the atmosphere. The drying ovens are upstream of the coating application stations. Therefore, maintaining the required pressure drop across the enclosure is adequate for demonstrating the ovens are under negative pressure as well.

Indicator Range – Greater than 0.007 Inches of Water with Windows Closed

NESHAP Subpart SSSS requires owners and operators to conduct enclosure monitoring in accordance with a custom enclosure monitoring plan. No specific guidance is given on what parameters are to be monitored or what the acceptable range is for the parameter chosen. However, the preamble of NESHAP Subpart SSSS refers to the Large Appliance Coating NESHAP (Subpart NNNN) for guidance on enclosure monitoring. As discussed in Subpart NNNN, Wolverine proposes a pressure drop of at least 0.007 inches of water on the primer room

and on the rubber coating enclosures, when the access windows and doors are closed, as CAM for capture system monitoring.

Indicator Monitoring Frequency – Continuous with Daily Records

Wolverine will develop a capture system monitoring plan in accordance with NESHAP Subpart SSSS requirements, which will include installation of a pressure monometer to measure the pressure difference between a point near where the coating is applied and a point outside of each of the three enclosures. The monometers will have an accuracy of at least 0.002 inches of water. The monometers will continuously monitor the pressure drop and once per shift the line operators will record the observed pressure drop across the three enclosures.

Specific QAQC Practices - Capture System

Wolverine proposes to re-calibrate each monometer at least once every six months using a pressure transducer or similar device.

Recordkeeping Practices - Capture System

Wolverine will maintain records of the once per shift pressure drop readings, calibrations, and the results of any corrective actions taken to increase the enclosure pressure drop if it falls below the set limit for a period of five years.

STREAMLINED REQUIREMENTS

Citation	Title of Citation	Description of Applicability
The 90% VOC control value requirement in 40 CFR 60.462(a)(3).	NSPS TT VOC Control Standard.	The NSPS's "90% control value" is exceeded by this permit's "98% VOC control value" for coating line 4.
The requirement that temperature monitoring be conducted every 15 minutes in NSPS TT.	NSPS TT VOC Control Standard.	The NSPS's requirement to monitor temperature every 15 minutes is met when meeting this permit's requirement to monitor temperature continuously in accordance with CAM and MACT SSSS which applies to the source June 10, 2005.
The requirement that the thermal oxidizer combustion temperature drop no more than 50 ^{0}F from the temperature measured during the performance test.	NSPS TT VOC Control Standard.	This NSPS requirement is met when meeting this permit's requirement that the thermal oxidizer combustion temperature remain at least as hot as the temperature measured during the performance test in accordance with MACT SSSS which is effective June 10, 2005.
9 VAC 5-50-80	20% opacity standard for new and modified sources.	The regulation's 20% opacity limit is exceeded by the permit's 5% opacity limit value.

GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that applies to all Federal Operating permit sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

STATE ONLY APPLICABLE REQUIREMENTS

No "State Only" requirements are contained in the underlying NSR permit.

FUTURE APPLICABLE REQUIREMENTS

This facility may be subject to the Organic Liquid Distribution MACT (OLD), Subpart EEEE. If subject, the facility would be considered an existing source. This plant would only be required to keep records to comply with the recordkeeping provisions of the Organic Liquid Distribution MACT (OLD). If subject, the permittee shall maintain a record of the volatile organic liquid stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period for each of the vessels subject to MACT EEEE:

Emission Unit Description
Solvent Tank #1-10,000 gallons
Solvent Tank #2- 5,000 gallons
Solvent Tank #4-5,000 gallons

INAPPLICABLE REQUIREMENTS

Compliance with the provisions of this permit shall be deemed compliance with all applicable requirements in effect as of the permit issuance date as identified in this permit. This permit shield covers only those applicable requirements covered by terms and conditions in this permit and the following requirements which have been specifically identified as being not applicable to this permitted facility:

Citation	Title of Citation	Description of Applicability
9 VAC 5-40-260	Standard for Particulate Matter Emissions	The Standard for Particulate Matter Emissions is not applicable to the emission units listed below because these emission units are inherently not particulate emitters: M1-Coating Mixing/Coating Preparation Equipment and CL2 and CL4 Coating Lines 2 and 4.
9 VAC 5-40-280	Standard for Sulfur Dioxide Emissions	The Standard for Sulfur Dioxide Emissions is not applicable to the emission units listed below because these emission units are inherently not sulfur dioxide emitters: M1-Coating Mixing/Coating Preparation Equipment and CL2 and CL4-Coating Lines 2 and 4.

Nothing in this permit shield shall alter the provisions of §303 of the federal Clean Air Act, including the authority of the administrator under that section, the liability of the owner for any violation of applicable requirements prior to or at the time of permit issuance, or the ability to obtain information by the administrator pursuant to §114 of the federal Clean Air Act, (ii) the Board pursuant to §10.1-1314 or §10.1-1315 of the Virginia Air Pollution Control Law or (iii) the Department pursuant to §10.1-1307.3 of the Virginia Air Pollution Control Law.
(9 VAC 5-80-140)

INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation[1]	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
CL2B	Unit 2 Boiler	9 VAC 5-80-720C	NOx, VOC, PM, CO	2.1 MMBtu/hr input natural gas/propane
CL2-D	Diablo In-Line Process Heater	9 VAC 5-80-720C	NOx, VOC, PM, CO	8.0 MMBtu/hr input natural gas
CL4-D	Diablo In-Line Process Heater	9 VAC 5-80-720C	NOx, VOC, PM, CO	4.0 MMBtu/hr input natural gas
G1	Oil Water Separator	9 VAC 5-80-720B	VOC	36 gallons
T1	Solvent Tank	9 VAC 5-80-720B	VOC	10,000 gal.
T2	Solvent Tank	9 VAC 5-80-720B	VOC	5000 gal.
T3	Solvent Tank	9 VAC 5-80-720B	VOC	3000 gal.
T4	Solvent Tank	9 VAC 5-80-720B	VOC	5,000 gal.
WA1	Waldron Coating line	9 VAC 5-80-720B	NOx, VOC, PM, CO	NA

[1]The citation criteria for insignificant activities are as follows:
9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application
9 VAC 5-80-720 B - Insignificant due to emission levels
9 VAC 5-80-720 C - Insignificant due to size or production rate

CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

PUBLIC PARTICIPATION

A public notice regarding the draft of the original permit was published in the *Roanoke Times* on November 14, 2004. Public comments were accepted for 30 days following publication of the notice, through December 14, 2004, but no comments were received. In addition, no comments were received from EPA during their concurrent 45 day proposed permit review period which ran from November 14, 2004 through December 29, 2004. The reopening of the permit was considered a minor, rather than significant, modification and was submitted to USEPA for review on November 29, 2005. No comments were received.

APPENDIX A: NSR/FOP CORRESPONDENCE TABLE

The following table is a modification of the table in the section Emission Unit Applicable Requirements – New Source Review Permit Requirements. This table is ordered corresponding to the NSR permit conditions as an aid to reference the corresponding federal operating permit conditions. The NSR permit follows in Appendix B.

NSR Condition	Title V Condition	Description	VAC Applicable Requirement
1	N/A	Plant location	
2	N/A	Equipment list	
3	III-A-1	Enclosure of coating lines	9 VAC 5-50-260, 9 VAC 5-60-100
4	III-A-2, III-B-1	VOC control for coating lines	9 VAC 5-50-260, 9 VAC 5-60-100
5	III-A-3	Control efficiency of RTO	9 VAC 5-50-260, 9 VAC 5-60-100
6	III-D-1	Appropriately placed test ports	9 VAC 5-50-30
7	III-A-4	Throughput limit for Coating Line #2	9 VAC 5-80-1180
8	III-A-5	Throughput limit for Coating Line #4	9 VAC 5-80-1180
9	III-A-6	Emission limit for Coating Line #2	9 VAC 5-50-260
10	III-A-7	Emission limit for Coating Line #4	9 VAC 5-50-260
11	III-A-8	Visible emission limit for coating lines	9 VAC 5-50-260
12	III-A-9	Requirement by reference – NSPS TT	9 VAC 5-50-400, 9 VAC 5-50-410
13	III-A-10	Requirement by reference – MACT SSSS	9 VAC 5-60-90, 9 VAC 5-60-100
14	III-A-11	Resolution of NSPS/MACT discrepancies	9 VAC 5-60-90, 9 VAC 5-60-100
15	III-A-12	Shutdown for excess HAP emissions	9 VAC 5-20-180
16	III-D-2	Testing for total permanent enclosure	9 VAC 5-60-100
17	III-D-3	Performance test for RTO	9 VAC 5-60-90, 9 VAC 5-60-100
18	III-D-5	VEE's on request	9 VAC 5-50-30
19a	III-C-1	Coating line throughput records	9 VAC 5-50-50
19b	III-C-7	Records of stack test and VEE results	9 VAC 5-50-50
19c	III-C-3	Continuous temperature records for RTO	9 VAC 5-50-50
19d	III-C-8	Retained Material Safety Data Sheets	9 VAC 5-50-50
19e	III-C-2	VOC emissions from coating lines	9 VAC 5-50-50
19f	III-C-9	Records of maintenance & training	9 VAC 5-50-50

NSR Condition	Title V Condition	Description	VAC Applicable Requirement
20	VIII-R	Right of Entry	9 VAC 5-170-130
21	VIII-F	Notification of Malfunction	9 VAC 5-20-180
22	V-2	Violation of Ambient Air Standard	9 VAC 5-20-180
23	V-1	Maintenance/Operating Procedures	9 VAC 5-50-20
24	VIII-V	Permit Revocation	9 VAC 5-80-1210
25	VIII-U	Change of ownership	9 VAC 5-80-1240
26	VIII-O	Registration/Update	9 VAC 5-20-160
27	N/A	Permit Copy	9 VAC 5-170-160

APPENDIX B: NSR PERMIT DATED October 6, 2005

The permit, with its own page numbering, follows.